

STATE OF COLORADO

Roy Romer, Governor
Patti Shwayder, Executive Director

Dedicated to protecting and improving the health and environment of the people of Colorado

HAZARDOUS MATERIALS AND WASTE MANAGEMENT DIVISION
<http://www.cdphs.state.co.us/hm/>

4300 Cherry Creek Dr. S.
Denver, Colorado 80246-1530
Phone (303) 692-3300
Fax (303) 759-5355

222 S. 6th Street, Room 232
Grand Junction, Colorado 81501-2768
Phone (970) 248-7164
Fax (970) 248-7198



Colorado Department
of Public Health
and Environment

November 13, 1998

Regina Sarter
DOE RFCA Project Coordinator
Rocky Flats Field Office
PO Box 928
Golden, Colorado 80402-0928

RE: Demolition of Building 729

Dear Ms. Sarter:

The Department has received your letter of October 20, 1998, transmitting the draft demolition plan for building 729 in the 779 cluster and entitled "Modification to the 779 Cluster Decommissioning Operations Plan for Demolition of Building 729" dated October 20, 1998.

We have since reviewed and commented on this plan, resulting in a revised plan dated "November 1998." With the revisions to the plan and the finalization of the air monitoring plan, the Department finds the plan to be acceptable. This letter constitutes approval of the "Modification to the 779 Cluster Decommissioning Operations Plan for Demolition of Building 729" dated November 1998.

Your October 20, 1998, transmittal letter indicated your belief that this approval action should be handled as a minor modification to the 779 DOP and required no formal approval, pursuant to paragraph 125 of RFCA. We disagree that RFCA paragraph 125 establishes the modification procedure governing this project.

Paragraph 125 refers to modifications to work being done under an RSOP. The 779 project is being done under a DOP, which under RFCA follows requirements for an IM/IRA. Paragraph 127 cites requirements for modifications to work approved under an IM/IRA. Under this paragraph, RFETS is required to submit proposed major modifications 30 days prior to the date DOE desires to execute proposed changes, and the LRA has 21 days to approve or deny the modification. For minor modifications under an IM/IRA, a 21 day lead time is required and the LRA must approve or deny within 7 days.

The Department views this application as a major modification, since details of the demolition project were not submitted with the original DOP. Please review item 4 of the Department's

1/2

DOCUMENT CLASSIFICATION
REVIEW WANTED PER
CLASSIFICATION OFFICE

RECEIVED
RECORDS CENTER

B779-A-000210

Demolition of Building 729
November 13, 1998
Page Two

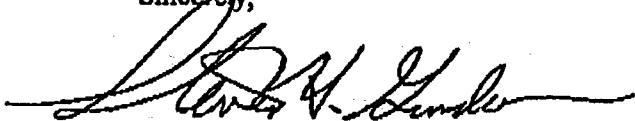
February 6, 1998, 779 DOP approval letter which clearly states "no demolition activities...are authorized without submittal, review and approval of the demolition plan by CDPHE."

The Department received the 729 demolition plan on October 22, 1998. This approval is provided within the 21 day time-frame prescribed within paragraph 127 of RFCA.

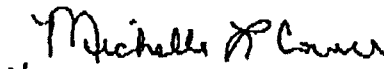
The approved demolition plan, page 3, states: "Initiation of project operations is dependent upon successful completion of a Kaiser-Hill Management Review with CDPHE (LRA) involvement." CDPIIE concurs with this statement and will be involved in the Management Review.

Thank you for your cooperation during the review, revision and approval phase of this project. If there are any questions regarding this letter, please contact Edd Kray, Building 779 Project Manager for CDPHE, at (303) 966-2115.

Sincerely,



Steven H. Gunderson
RFCA Project Coordinator



Edd Kray
Building 779 Project Manager

cc: John Whiting, K-H
Dan Miller, AGO
Dave Nickless, DOE

Tim Rehder, EPA
RFCAB
John Rampe, DOE

2/2

000071